



ILLINOIS Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1631210009 -- St. Clair County  
Sauget/TWI  
Permit No. 1983-10-OP  
Log No. 1985-111

November 28, 1983  
Revised September 12, 1985

Trade Waste Incineration  
Division of Chemical Waste Management, Inc.  
#7 Mobile Avenue  
Sauget, Illinois 62201-1069

Gentlemen:

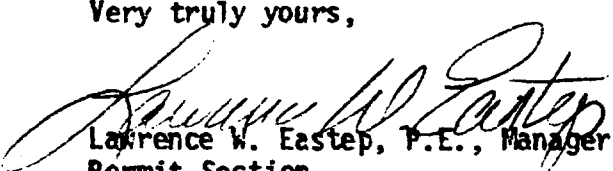
Enclosed is the revised Operating Permit No. 1983-10-OP from the Division of Land Pollution Control. This revision reflects the modification indicated below and incorporated by reference in the revised permit.

Approval to transfer wastes to the SCA incinerator in accordance with the application and the following procedures:

- . Receive wastes in steel drums and/or tank trucks,
- . Handle the wastes in accordance with the existing operating permit at TWI (ie, decant and blend operations),
- . Repackage wastes into containers and/or tank truck loads which meet the requirements of the SCA incinerator's operating permit,
- . Transfer the repackaged wastes to the SCA incinerator (0316000058).

Permit conditions 33, 34, 35, and 36 have been added for this operation.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WRW:jab/1968E/12

Enclosure

cc: Division File  
Southern Region

005506

217/782-6762

Refer to: 1631210009 -- St. Clair County  
Sauget/TWI  
Permit No. 1983-10-OP  
Log Number: 1985-111

November 28, 1983  
Revised September 12, 1985

Trade Waste Incineration  
Division of Chemical Waste Management, Inc.  
#7 Mobile Avenue  
Sauget, Illinois 62201-1069

Gentlemen:

Permit is hereby granted to Trade Waste Incineration, a Division of Chemical Waste Management, Inc., to operate a solid waste management site to store hazardous and non-hazardous special waste in drums, store hazardous and non-hazardous special waste in tanks, and incinerate hazardous and non-hazardous special waste, said site generally described as 33.795 acres in Township 2 North, Range 10 West, Third Principle Meridian, more specifically described in Attachment A incorporated herein by reference, all in accordance with the application and plans prepared by Michael Rapps, P.E., and referenced in the development permit, and the application and plans referenced below:

- a. Operating application and plans dated August 17, 1983 and received August 25, 1983;
- b. Operating application and plans dated September 28, 1983 and received October 3, 1983;
- c. Procedure for managing incompatible wastes in drums and revised drum storage area inspection sheet dated October 19, 1983 and received October 20, 1983;
- d. Revised procedure for the management of incompatible wastes in drums dated October 28, 1983 and received October 31, 1983;
- e. Revised procedure for the management of incompatible wastes in drums dated November 4, 1983 and received November 7, 1983;
- f. Request for extension of the review period until November 30, 1983 dated November 14, 1983 and received November 15, 1983;
- g. Application and plans of the thick liquids feeder dated February 13, 1984 and received February 15, 1984;

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Permit is also granted for the construction and operation of a drum crusher all in accordance with the application and plans prepared by Trade Waste Incineration and referenced below:

- a. Applications dated January 20, 25, 27 and February 2, 1984 and received by this Agency on January 24, 25, 27 and February 3, 1984 respectively.
- b. Application and plans dated February 10, 1984 and received February 14, 1984.

Permit is also granted for the construction of a shred pax shredder model AZ-7 all in accordance with the application and plans prepared by Trade Waste Incineration and referenced below.

- a. Application and plans dated June 5, 1984 and received by this Agency June 6, 1984.
- b. Revised plans dated July 30, 1984 and received by this Agency July 31, 1984.

Permit is also granted for the facility to delete hourly stack plume observations and reporting from the operating requirements and to operate according to the revised waste analysis, personnel training, and closure plans all in accordance with the application and plans prepared by Trade Waste Incineration and referenced below.

- a. Application dated July 31, 1984 and received August 1, 1984.
- b. Supplemental information dated August 3, 1984 and August 17, 1984 and received August 6, 1984 and August 20, 1984 respectively.
- c. Revised waste analysis and closure plans dated May 23, 1984 and received May 24, 1984.
- d. Revised personnel training plan dated July 11, 1984 and received July 16, 1984.

Permit is also granted for the construction and testing of incinerators No. 2 and No. 3 all in accordance with the application prepared by Trade Waste Incineration and referenced below:

- a. Application dated May 16, 1984 and received May 17, 1984.
- b. A 90-day waiver dated August 15, 1984 and received August 16, 1984.
- c. A second 90-day waiver dated October 23, 1984 and received October 24, 1984.

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Permit is also granted for the transfer of wastes to the SCA incinerator in Chicago, Illinois (0316000058), all in accordance with the application prepared by Trade Waste Incineration and referenced below:

- a. Applications dated June 11, 1985 and July 30, 1985, and received June 14, 1985 and August 2, 1985 respectively.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This facility shall be developed and operated in accordance with 35 Ill. Adm. Code, Subtitle C and G. In the event that the development or operating plan submitted with the application differs from the terms and conditions of this permit, the terms and conditions of this permit shall apply.
2. This permit allows operation of the existing equipment as described in the material referenced above. Any modification to the facility, or types or classes of wastes shall be the subject of an application for supplemental permit for site modification submitted to this Agency.
3. The owner or operator must keep a written operating record at the facility. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility:
  - a. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility;
  - b. The location of each hazardous waste within the facility, and the quantity at each location;
  - c. Records and results of waste analysis and trial tests;
  - d. Summary reports and details of all incidents that require implementation of the contingency plan;
  - e. Records and results of inspections (inspection records and results need be kept only three years).
4. Incompatible wastes in drums shall not be stored in the same storage shelter at the same time.
5. Incompatible wastes in containers shall be segregated in accordance with the I.D.O.T. labels on them. These labels shall be clearly visible during storage. An I.D.O.T. chart describing wastes which are incompatible with each other shall be displayed in the drum storage area.

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6. All wastes received shall only be stored in permitted storage areas.
7. All incoming special wastes must be accompanied by a manifest. For wastes that are going to be incinerated, the following authorization numbers shall be used for the wastes indicated below:
  - . 090001 - Hazardous Waste
  - . 090002 - Non-hazardous Special Waste
  - . 090003 - Hazardous Hospital Waste
8. The drum storage capacity of the facility shall be limited to 2000 drums.
9. The tank storage capacity of the facility shall be limited to a capacity of 124,535 gallons and shall be operated at no more than 90% of that volume, or 112,080 gallons. This estimate includes the four blend tanks and the nine isolation tanks.
10. The use and management of containers to store hazardous waste shall be in compliance with 35 Ill. Adm. Code 725.270 to 725.277. Adequate aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency. At a minimum these requirements shall be in conformance with State Fire Marshall recommendations.
11. The use and management of the tanks to store hazardous waste shall be in compliance with 35 Ill. Adm. Code 725.290-725.298.
12. The use and management of the incinerator to process hazardous waste shall be in compliance with 35 Ill. Adm. Code 725.440-725.451.
13. All loading/unloading of special wastes shall be accomplished over spill containment devices.
14. Wastes that are transferred into drums at the facility shall only be transferred into new drums or empty drums that previously held a compatible waste.
15. Hospital waste shall be incinerated immediately upon receipt or as soon as possible within 10 days.
16. All containers that held an acute hazardous waste as identified in Section 721.133(c) of Title 35: Subtitle G: Waste Disposal, shall be incinerated after the waste is removed or disposal of using the Agency's special waste stream system.
17. All waste fed to incinerator No. 1 shall be in compliance with the terms and conditions of Permit No. 83080072 issued by this Agency's Division of Air Pollution Control.

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18. The discharge of any potentially contaminated storm water run-off, hazardous waste spills or process waters other than venturi scrubber wastewater into the Village of Sauget STP shall be in compliance with 35 Ill. Adm. Code: Subtitle C.
19. All incoming wastes shall be analyzed in accordance with the waste analysis plan submitted with the application. Records and results of these analyses shall be kept in the operating record.
20. Inspections of the tanks, drum storage facility, incinerator, safety and emergency equipment, and other associated equipment shall be carried out in accordance with the schedule contained in the application. Records of all inspections shall be kept in the operating record.
21. Special wastes generated at the site and disposed or further treated elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit and manifest systems.
22. The closure cost estimate must be periodically updated in accordance with 35 Ill. Adm. Code 725.242 to reflect the following:
  - a. Any change in the closure plan which affects the cost of closure; or
  - b. Any change in the closure cost estimate as a result of inflation, as required by 35 Ill. Adm. Code 725.242.

The instrument used for financial assurance must be updated periodically as required by 35 Ill. Adm. Code 725.243 to reflect changes in the current closure cost estimate.

23. The Permittee shall prepare and submit a single copy of an annual report to the Director of this Agency by March 1 of each year, covering facility activities of the previous calendar year. The Agency will supply the necessary forms.
24. Permittee shall notify the Agency of any changes from the information submitted to the Agency in its application for a developmental and operating permit for this site. Permittee shall notify the Agency of any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. Such notification shall be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
25. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.

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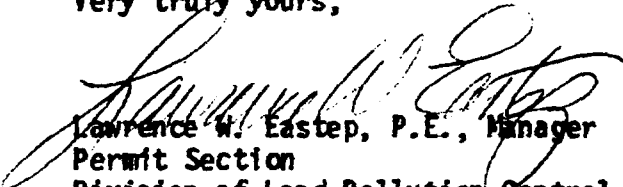
26. The Agency reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.
27. Nothing in this permit shall be construed as relieving the permittee of the responsibility of complying with other local, state or federal rules or regulations regarding this facility.
28. All drums that are to be crushed shall be empty according to RCRA definitions.
29. Drums that contained a hazardous waste identified in Section 721.133(c) (P listed waste), shall be incinerated prior to being crushed in this unit.
30. The drum crusher shall be operated and stored in an area that has a secondary containment system.
31. All crushed drums shall be transported to a permitted hazardous waste management facility utilizing the Agency's supplemental permit and manifest systems.
32. All waste fed to incinerators No. 2 and No. 3 shall be in compliance with the terms and conditions of Permit No. 83120053 issued by this Agency's Division of Air Pollution Control.
33. The transfer wastes to the SCA incinerator shall be in accordance with the application referenced above and the following procedures:
  - . Receive wastes in steel drums and/or tank trucks.
  - . Handle the wastes in accordance with the existing operating permit at TWI (i.e., decant and blend operations),
  - . Repackage wastes into containers and/or tank truck loads which meet the requirements of the SCA incinerator operating permit,
  - . Transfer the repackaged wastes to the SCA incinerator (0316000058).
34. All shipments of wastes of the SCA incinerator (0316000058) shall list TWI as the generator.
35. For all wastes shipped to the SCA incinerator, the following authorization numbers shall be used for the wastes indicated below:
  - . 090004 - hazardous waste
  - . 090005 - non-hazardous special waste

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36. The permittee shall comply with Ill. Rev. Stat., 1980, Sec. 1022.2(b), as amended from time to time, and with the procedures adopted by the Agency in furtherance of such statutory provision and as set forth in a document entitled "Procedures for Operation of a Hazardous Waste Disposal Fee System," as published in 4 Illinois Register 774 (September 12, 1980).

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

<sup>EPT</sup>  
LWE:WRW:bjh/sp/1644D/1,6

<sup>WRW</sup>  
cc: Southern Region  
Compliance Monitoring Section  
Division File

005513



# REQUEST FOR COMMENTS ON A PENDING PERMIT APPLICATION

Log No. 1985-111

To: Track H  
(Regional Manager or Compliance Monitoring) (Region)

From: DAU, Permit Section  
(Reviewer) (Unit)

Facility No. 1637210009 County St Clair

City Danville Facility Name T & I

The Permit Section received on 6-14-85 an application/additional  
(Date)

information to modify/develop/operate new to modify operation  
for the above site. A copy of this information is attached/available for your review.  
Your comments regarding the groundwater monitoring inadequacies, design, operation or  
any pending violations are requested. Please submit your comments by 7-14-85.  
If not received within the time specified, we would assume that you do not have  
any problems or concerns.

COMMENTS:

Pre-Issuance/Denial Meeting requested on (less than 60 days from receipt, OP < 40 days)

(Date) (Time -- a.m. or p.m.)

In Attendance Permit Section  
and/or Compliance  
Conference Call F.O.S.

Results of Meeting:

Attachment

005514



~~WED @ 1500~~

THE OPERATION AT TWI APPEARS  
TO MEET THE DEFINITION OF TREATMENT  
PER ~~225~~ 720.110

8/12 JIM COBB APC

5/13 WASTES ACCEPTABLE @ ~~W~~ TWI  
WOULD ALSO BE ACCEPTABLE @ SCA  
(SAME INCINERABILITY INDEX, etc)

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ROB WATSON

AUG. 22, 1985

WILLEN SWEET CWM  
JIM GARY TWI

# ① APPLICATION LOG NO. 1985-111

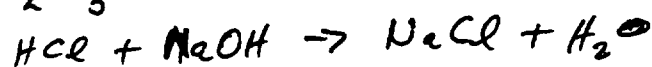
PROPOSAL TO BRING ~~WASTES~~ WASTES TO  
TWI ~~RECYCLE~~ BLEND, REPACKAGE  
AND SHIP TO SCA (ONLY WASTES ACCEPTABLE  
TO TWI WILL BE RECEIVED, i.e. NO PCBs > 50 ppm)

## ② CHEMICAL TREATMENT



HYDROLYSIS

TITANIUM  
TRICHLORIDE



## ③ CWM FUEL PROGRAM

1. RECOVERY
2. FUELS
3. INCINERATION

005517

22 Aug 1985

Incinerator Electric

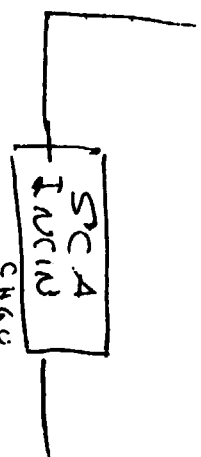
# TRANSFER OF WASTE

The System -

Double Feed  
RICKA Empty drums

1/22. WASTE CATHODE -

Jim "I"  
W. Sweet  
J. Cobb  
Rel. relation  
- Thomas

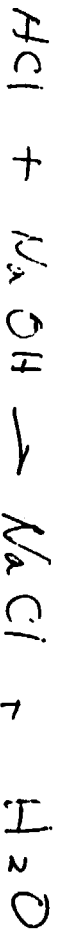
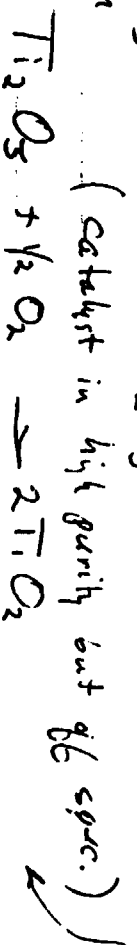
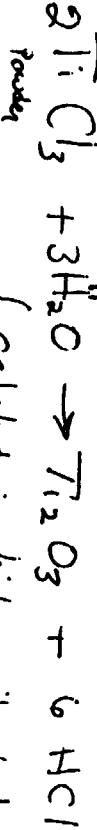


all cords & each side to be used  
" water to be incinerated at SCA  
Manifert  
TUI Generator  
All feeds to be PAID.

Proposal to be  
approved; either:  
1. By letter agreement  
or 2. By certification  
operating permit

## II Chemical Treatment

(highly reactive work - strong chem)



Hydrolysis  
Neutralization  
Oxidation  
and,

during interim status, equipment to phase into

Recovery Option: Recover: Sup. Permit to move site decommission/ or

US EPA APPROVES ADDITION OF THIS OPERATION TO THEIR "PART A"

Incineration  
**Chemical Waste Management, Inc.**

7 Mobile Avenue  
Sauget, Illinois 62201-1069  
(618) 271-2804

June 11, 1985

Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, Illinois 62706

Att: Rob Watson  
Permit Section

Re: Trade Waste Incineration Division  
Chemical Waste Management, Inc.  
I. D. No. 163121 AAP  
Operating Permit No. 1983-10-OP

Dear Mr. Watson:

This letter is to inform you of additional waste handling procedures which are planned for operations at the T.W.I. facility in Sauget. Although the new procedures appear to fall within T.W.I.'s existing operating permit, we request your concurrence or issuance of a supplemental operating permit.

To further improve waste management services to our customers, T.W.I. plans to unload certain liquid and solid materials from drums for transfer to another off-site incineration facility. For the most part, the wastes will be of two types: 1) those which can not presently be processed at T.W.I. (e.g., high chlorine, high ash liquids), or 2) solid wastes in steel drums which can be more effectively repackaged at T.W.I. in fiber or plastic containers for direct incineration at the off-site facility.

The procedure for unloading liquid waste from drums for transshipment to off-site facilities will take place inside the existing, contained drum work-up area and will consist of pumping (decanting) the contents of drums directly to tank trucks or pumping drums to the T.W.I. isolation tank farm (which is done presently on a routine basis) then transferring from isolation tanks to tank trucks. In either operation the same loading point from the west side of the T.W.I. tankfarm will be used. A containment area outside the west dike wall of the tankfarm, (approximately 25' X 10' X 0.5') will be utilized for potential spill containment.

In the first case, pumping directly from drums to tank truck, the following procedure will be followed:

RECEIVED  
JUN 14 1985  
IEPA-DLPC

005519

- 1) A tanker will be positioned on the west side of the tankfarm, parallel to the west tankfarm wall. The rear end of the tanker will be positioned 3 to 5 feet from the covered underground concrete pipe trench, wheels will be chocked.
- 2) A 10-gallon, stainless steel drip pan will be placed under the inlet attachment fitting to the tank truck.
- 3) A 2-inch chemical duty hose will be connected between the tank truck and tankfarm manifold header.
- 4) Valving will be arranged to allow pumping from drum decant facility pumps through the manifold header to the tanker truck. Valves directly after the drum decant pump will be used and the valve at the exit of the manifold header to the hose connecting to the tank truck will only be opened when actual pumping is occurring.
- 6) After the last drum is pumped to the tank truck, the content of the pipes being used in the transfer operation will be drained into the tanker.
- 7) After draining lines, valves will be readjusted to standard tankfarm configuration (all valves closed).

In the second case, pumping materials from drums to isolation tanks, then from isolation tank to tank truck, the procedure will be very similar to the first case. The same set-up procedure will be used except the valving on the manifold header will be set to allow pumping from the isolation tank to tank truck using the corresponding high volume tankfarm transfer pump. The transfer hose from the isolation tank will be located inside the tank farm containment area. Prevention of spills will be accomplished by using equipment in good condition, training operators, using drip pans, draining lines empty before disconnecting and making the transfer on concrete which slopes toward the pipe trench.

All T.W.I. safety equipment (i.e. - fire extinguishers, spill clean-up absorbents, portable air driven pumps, hoses, etc.) is accessible to the work area for use at any time if needed. All existing rules and procedures established by T.W.I. for drum decanting will be in force during the transfer operation.

Solid wastes in drums will be unloaded and moved to the drum work-up area using standard T.W.I. operating procedures. Wastes retained for off-site incineration will be manually removed from 55-gallon steel drums and put into incinerable fiber or plastic U.S. DOT-approved containers, most often of a smaller size (5-30 gallons).

The containers will be closed, sealed and properly labeled for shipment. They will then be moved from the drum work-up area to the production loading dock or directly to a waiting, licensed carrier at the truck loading well.

Illinois Environmental Protection Agency  
June 11, 1985  
Page 3

All operations will be conducted according to current DLPC operating permit conditions and will be carefully monitored by T.W.I. supervisory personnel through T.W.I. daily site inspections. Both operations and paperwork will be monitored by the Chemical Waste Management Environmental Compliance Officer assigned to the T.W.I. facility.

Liquid and solid wastes shipped to off-site incineration will be properly labelled and manifested to comply with all applicable Illinois and federal regulations. Empty containers will be disposed of according to current permitted procedures, i.e., recycled at a permitted drum reclamation facility, crushed and/or disposed of at a permitted hazardous waste management facility, using The Agency's supplemental permit and manifest system.

If you would like any additional information or clarification regarding the above, please contact me or the facility General Manager, Mr. Jim Gary.

Sincerely,



Wileen E. Sweet  
District Environmental Engineer

WES:jh

cc: Jim Gary  
Andy Flanagan  
Doug Cook  
Dennis Romankowski